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15 ATTORNEYS FOR PLAINTIFF GIA-GMI, LLC AND THIRD PARTY DEFENDANT J. RICHARD BLANKENSHIP

16
17 **UNITED STATES DISTRICT COURT**
18
19 **NORTHERN DISTRICT OF CALIFORNIA**

20
21 GIA-GMI, LLC, a Florida Limited
22 Liability Company,

23 Plaintiffs,
24 v.

25 DANIEL R. MICHENER, et al.,
26 Defendants.

27 DANIEL R. MICHENER, an individual,
28 JAMES M. MCWALTERS, an individual,

29 Third-Party Plaintiffs,

30 v.

31 J. RICHARD BLANKENSHIP

32 Third-Party Defendant.

33 Case No. C 06-7949 SBA

34
35 **STIPULATED REQUEST AND
36 [PROPOSED] ORDER TO EXTEND
37 DEADLINE TO REOPEN CASE TO
38 DECEMBER 4, 2007**

39
40 **The Honorable Sandra Brown
41 Armstrong**

42
43 On October 3, 2007, this Court issued an order stating that, if settlement is not reached,
44 any party may move to reopen the above-captioned case by motion filed no later than forty-five
45 (45) days after the date of the order. That deadline is November 19, 2007. The parties are still
46 finalizing settlement documentation in this matter, and agree that additional time is needed to
47 complete the settlement documentation. As such, pursuant to Civil L.R. 6-2(a) and 7-12,
48 Plaintiff GIA-GMI, LLC, Third Party Defendant J. Richard Blankenship, and Defendants and

1 Third-Party Plaintiffs Daniel R. Michener and James M. McWalters, and Defendants Charles D.
2 Toy, Allan M. Dunn, Larry J. Austin, W. Denman Van Ness, Michael P. Salucci, Computer and
3 Software Enterprises, Inc., Pangea Holdings, LLC, and Pangea Trading Corporation, through
4 their respective undersigned counsel, hereby stipulate that the deadline for filing a motion to
5 reopen the above-captioned case be extended from November 19, 2007 to **December 4, 2007**.
6

7 DATED: November 13, 2007

GOODIN, MACBRIDE, SQUERI, RITCHIE & DAY
8 LLP

9

10 By: /s/ Francine T. Radford

11 FRANCINE T. RADFORD

12 Attorneys for Defendants and Third-Party
13 Plaintiffs Daniel R. Michener and James M.
14 McWalters, and Defendants Charles D. Toy,
15 Allan M. Dunn, Larry J. Austin, W. Denman
16 Van Ness, Michael P. Salucci, Computer and
17 Software Enterprises, Inc., Pangea Holdings,
18 LLC, and Pangea Trading Corporation

19 DATED: November 13, 2007

FOLEY & LARDNER LLP

20

21

By: /s/ Eileen R. Ridley

22 EILEEN R. RIDLEY

23

Attorneys for Plaintiff GIA-GMI, LLC, and
24 Third Party Defendant J. Richard Blankenship

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

26

DATED: 11/15/07


27 HONORABLE SAUNDRA BROWN
28 ARMSTRONG